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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND THE RICHMOND
JOINT POWERS FINANCING AUTHORITY,

Plaintiffs,

v.

ROYAL BANK OF CANADA, JP MORGAN
CHASE, PUBLIC RESOURCES ADVISORY
GROUP, AND THE MAJORS GROUP

Defendants.

No. 3:25-cv-03348-CRB

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING CASE
MANAGEMENT DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, Plaintiffs City of Richmond and Richmond Joint Powers Financing Authority (collectively, “Plaintiffs”) and Defendants Royal Bank of Canada and Public Resources Advisory Group (collectively, “Defendants,”¹ and, together with Plaintiffs, “the Parties”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on June 23, 2025, the Court entered the Parties’ Joint Stipulation To Extend Current Case Deadlines (ECF No. 21);

¹ Though named as a defendant in the caption above, the Amended Complaint, ECF No. 22, no longer asserts any claims against JPMorgan Chase Bank N.A. (“JPMC”), which is no longer a party to this Action. Further, despite numerous attempts, Plaintiffs have not yet been able to effectuate service on defendant The Majors Group.

1 WHEREAS, pursuant to the deadlines established by ECF No. 21, on July 9, 2025, Plaintiffs
2 filed an amended complaint in this Action (the “Unjust Enrichment Action”) (ECF No. 22); on July 30,
3 2025, the Parties met and conferred regarding initial disclosures, early settlement, ADR process
4 selection, and discovery plan; and on July 30, 2025, the Parties filed ADR Certifications (ECF Nos.
5 23-25);
6

7 WHEREAS, on August 12, 2025, the Court entered a stipulation staying the remaining case
8 deadlines established by ECF No. 21 because the City Attorney for the City of Richmond, the
9 prosecuting authority for Plaintiffs (“Plaintiffs’ Prosecuting Authority”), filed a California False
10 Claims Act case against Royal Bank of Canada and JPMC based on allegations related to this action
11 that remained under seal (the “CA FCA Action”), and the parties to the Unjust Enrichment Action
12 agreed that, once the CA FCA Action was unsealed, they would seek relation of the two actions (ECF
13 No. 27);
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15 WHEREAS, on September 30, 2025, the parties to the Unjust Enrichment Action moved to
16 relate the CA FCA Action to this case (ECF No. 28);

17 WHEREAS, on October 1, 2025, the Court entered an order relating the CA FCA Action to this
18 case (ECF No. 30);

19 WHEREAS, the parties to the two actions met and conferred and determined that, since
20 Plaintiffs’ Prosecuting Authority intends to amend the complaint in the CA FCA Action, the parties
21 should wait to set further deadlines until after the amendment is filed so that they can confer regarding
22 whether they will stipulate to consolidate the actions and, if so, for what purposes;
23

24 WHEREAS, the Court entered a stipulated order providing a deadline of October 31, 2025 for
25 Plaintiffs’ Prosecuting Authority to file an amended complaint in the CA FCA Action and a deadline
26 of 14 days after the amended CA FCA Action complaint is filed for the parties to jointly propose new
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1 case management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in ECF No.
2 27 (ECF No. 32);

3 WHEREAS, Plaintiffs and Plaintiffs' Prosecuting Authority have asked Defendants for
4 additional time to confer regarding amendments to the CA FCA Action, and Defendants do not object
5 to Plaintiffs' request;

6
7 WHEREAS, Plaintiffs and Plaintiffs' Prosecuting Authority have also conferred with counsel
8 for JPMC, which is not a party to this action but only to the CA FCA Action, and which also does not
9 object to Plaintiffs' request;

10 NOW, THEREFORE, THE PARTIES STIPULATE AND PROPOSE that:

- 11 1. Plaintiffs' Prosecuting Authority will file an amended complaint in the CA FCA Action
12 by December 5, 2025;
- 13 2. Within 14 days after the amended CA FCA Action complaint is filed, the parties shall
14 jointly propose new case management deadlines to replace the deadlines in ECF No. 21
15 that this Court stayed in ECF No. 27.
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18 Submitted this 29th Day of October, 2025.
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By s/ Matthew S. Melamed

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PURSUANT TO STIPULATION, IT IS SO ORDERED

October 30, 2025

Date



The Honorable Charles R. Breyer, Senior District Judge
United States District Court for the Northern District of
California